

April 6, 2018

**VIA ECF**

Honorable Sarah Netburn  
Thurgood Marshall Courthouse  
United States District Court  
40 Foley Square, Room 430  
New York, New York 10007

*Coordinated RMBS Trustee Actions Against HSBC Bank USA, N.A.,*  
Nos. 14-cv-08175, 14-cv-09366, 14-cv-10101, 15-cv-02144, 15-cv-10032, 15-cv-10096

**Subject: Plaintiffs' Proposed Scheduling Order**

Dear Judge Netburn,

We write on behalf of Plaintiffs in the above-referenced actions to submit a corrected proposed scheduling order in advance of the April 9, 2018 hearing. The enclosed scheduling order corrects a typographical error in Paragraph 3.a of Plaintiffs' proposed schedule submitted on March 16, 2018 [*Commerzbank* ECF 378], which provides for motions for summary judgment and motions to exclude an expert under Rule 702 or *Daubert* to be filed no later than eighteen (18) months after expiration of the stay. As submitted, Plaintiffs' corrected proposed scheduling order amends the deadline for summary judgment and Rule 702 or *Daubert* motions to be filed no later than twenty-two (22) months after the stay.

Respectfully submitted,

s/ Benjamin Galdston  
Benjamin Galdston  
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*Counsel for Blackrock  
Balanced Capital Portfolio  
(FI), et al.*

s/ Christopher M. Wood  
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s/ Niraj J. Parekh  
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Wollmuth Maher  
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*Counsel for Phoenix Light SF  
Limited, et al. and  
Commerzbank AG*

s/ John A. Libra  
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*Counsel for National Credit  
Union Administration Board*

s/ John G. Moon  
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Enclosure